

A091 (Rev. 8/01) Criminal Complaint

Clerk, U.S. District Court
Southern District of Texas
FILED

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS**

AUG - 8 2014

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

V.

**Alejandra GARCIA
Llesica BARRERA**

CRIMINAL COMPLAINT

Case Number:

C-14-862M

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about 8/7/2014 in Brooks County, in the
(Date)

Southern District of Texas defendants, **Alejandra GARCIA & Llesica BARRERA**

each aiding, abetting and assisting one another, did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law

in violation of Title 8 United States Code, Section(s) 1324

I further state that I am a(n) Special Agent and that this complaint is based on the
Official Title following facts:

See Attached Affidavit of ICE Special Agent **Doug MacQuarrie**

Continued on the attached sheet and made a part of this complaint:

☒ Yes

☐ No


Signature of Complainant

Doug MacQuarrie

Printed Name of Complainant

Sworn to before me and signed in my presence,

August 8, 2014

Date

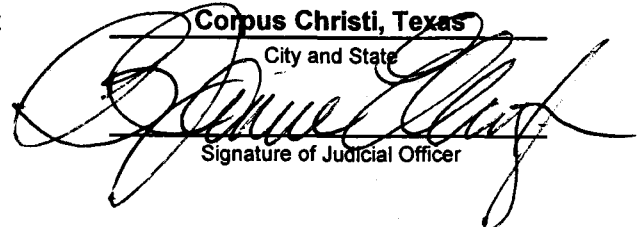
B. Janice Ellington, U.S. Magistrate Judge

Name and Title of Judicial Officer

at

Corpus Christi, Texas

City and State


Signature of Judicial Officer

AFFIDAVIT

On August 7, 2014, Border Patrol Agent Daniel Tista, encountered and arrested Alejandra GARCIA and Llesica BARRERA at the Falfurrias Border Patrol Checkpoint, transporting three undocumented aliens from Mexico in the trunk of their vehicle. GARCIA was driving a 2002 Chevrolet, Cavalier displaying Texas license plates NLS030, near Falfurrias, Texas.

On August 7, 2014, at approximately 12:25 p.m. a white Chevrolet Cavalier displaying Texas License Plates NLS030 approached the primary area of inspection for an immigration inspection of its occupants. BPA Tista looked inside of the vehicle and noticed one additional passenger and several infant children. BPA Tista asked GARCIA if she could identify everyone inside of the vehicle. GARCIA stated she was headed to Houston, Texas with her cousin Llesica BARRERA and both of their children. BPA Tista asked the passenger, later identified as Llesica BARRERA if she was a United States Citizen. BARRERA nervously mumbled "Yes". BPA Tista asked GARCIA if there was any luggage in the trunk of the vehicle, since there was no visible luggage inside. GARCIA stated that the trunk was empty. BPA Tista asked GARCIA if he could look inside of the trunk of the vehicle. GARCIA said yes and quickly popped the latch. BPA Tista asked GARCIA if she would park in the secondary area for further immigration inspection on BARRERA and to look inside of the trunk. GARCIA agreed and was directed to the secondary area.

Once in secondary inspection, GARCIA and BARRERA were asked to step out of the vehicle in order to verify their immigration status. GARCIA was asked for consent to search the trunk of the vehicle and GARCIA allowed agents to look inside. Upon opening the trunk of the vehicle three males (later identified as Victor NAMBO-Escamilla, Juan Antonio SOLORZANO-Acosta and Marcos PINON-Ortega) were enveloped in sweat and emerged. A brief interrogation was conducted and all three subjects freely admitted to being from Mexico, illegally present in the United States. At that time GARCIA and BARRERA were placed under arrest and escorted inside of the checkpoint for processing.

Once inside the Checkpoint, BPA Tista read GARCIA and BARRERA their rights as per Service form I-214 in the language of their choice, English. GARCIA and BARRERA signed the service form I-214, indicating that they understood their rights. Border Patrol Agent M. Castillo witnessed the reading and the signing of the rights. GARCIA and BARRERA agreed to waived their rights and speak without having a lawyer present.

GARCIA stated she was called by BARRERA and asked if she was willing to transport three illegal aliens to Houston, Texas. GARCIA stated she agreed and awaited a phone call from BARRERA with the specific details. GARCIA stated on yesterday's date BARRERA and herself went to the Americas Best Value Inn and Suites in Pharr, Texas to meet up with a smuggler by the name of "Lee", which works for a head smuggler by the name of "Lalo". GARCIA stated "Lee" was recommended by "Lillian" which is a relative of BARRERA. GARCIA stated BARRERA was going to give her half the proceeds of \$1,100.00 USD for transporting three illegal aliens. GARCIA stated BARRERA notified her because she knew she was in need of money. GARCIA stated she knew it was wrong especially because both of her babies were inside of the vehicle. GARCIA stated BARRERA and herself loaded all three subjects inside of the vehicle earlier this morning. GARCIA stated she was being followed by "Lee" in order to make sure they made it through the Checkpoint.

BARRERA stated she was approached by her relative cousin "Lillian" if she wanted to make easy money. BARRERA stated she agreed and called her friend GARCIA to recruit her as the driver to Houston, Texas. BARRERA stated she is in need of the money since her baby's father is not helping her with expenses. BARRERA stated she made most of the arrangements with "Lillian" and advised GARCIA

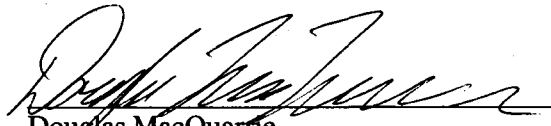
yesterday to stay at the same hotel that the illegal aliens were staying. BARRERA stated early this morning they both loaded all three subjects into the trunk of the vehicle and headed for Houston, Texas.

All three subjects (NAMBO, SOLORZANO and PINON) gave sworn statements of the smuggling arrangements with GARCIA as the driver and BARRERA as the passenger. Victor NAMBO-Escamilla and Juan Antonio SOLORZANO-Acosta were held as material witnesses and processed accordingly.

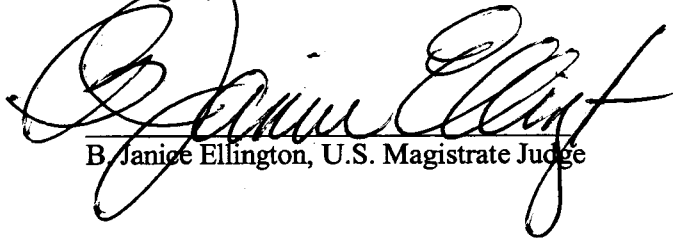
Solorzano + NAMBO were directed by Garcia + Barrera to enter the vehicle.
SA Doug MacQuarrie responded to the scene and photographed the vehicle used during the alien smuggling attempt and conducted further interviews of all parties involved.

No exculpatory statements were provided by any of the individuals involved. All of the individuals involved appeared to be in good health.

AUSA Lance Duke was notified of the facts and agreed to prosecute GARCIA and BARRERA for violation of Title 8 USC 1324.


Douglas MacQuarrie
Special Agent
Homeland Security Investigations

SUBSCRIBED AND SWORN TO
BEFORE ME THIS 8th Day
Of August, 2014


B. Janice Ellington, U.S. Magistrate Judge